

**REMARKS**

Favorable reconsideration of this application is respectfully requested in view of the following remarks.

Claims 1, 18 and 21 have been amended, Claims 6-15 have been canceled and new dependent Claims 25-31 are presented for consideration. Thus, the claims currently pending in this application are Claims 1-5 and 17-31, with Claims 1, 18 and 21 being the only independent claims.

Independent Claims 1, 18 and 21 have been rejected based on the disclosure contained in U.S. Patent No. 5,802,894 to *Jahrsetz et al.* in view of the disclosure set forth in U.S. Patent No. 5,348,357 to *Konchan et al.* Reconsideration of that rejection is respectfully requested for at least the following reasons.

As discussed in the prior response, *Jahrsetz et al.* describes a door lock having a release lever 15 engageable with a release pin 14 provided on a keeper pawl 8. The release lever 15 is provided with an abutment 16. The disclosed lock also includes a coupling lever 17 having a first lever portion 19 pivotably mounted on a pin 19a and a second lever portion 20 connected by way of a pin 19b to the first lever portion 19. The second lever portion 20 carries a coupling pin 18. A lever 26 is mounted on a pin 27 and is adapted to swing about the pin 27 through operation of an interior lever 9. The lever 26 is provided with a member 28 in which is formed a slot 29. The pin 18 provided on the second lever portion 20 is positioned within the slot 29.

In the ineffective position of the coupling lever 17 shown in Fig. 2 of *Jahrsetz et al.*, the pin 18 is located below the path of the abutment 16 on the release lever 15 so that if the interior lever 9 is lifted to cause a clockwise swinging movement of the levers 26, 28, the pin 18 on the second lever portion 20 does not contact the abutment 16 on the release lever 15. Thus, in this ineffective position of the coupling lever 17, the lifting of the interior lever 9 does not result in rotation of the release lever 15 and thus does not cause rotation of the keeper pawl 8.

From the ineffective position of the coupling lever 17 shown in Fig. 2, the operation of the electric motor 30 causes the first lever portion 19 to swing in the counterclockwise direction about the pivot 19a. This causes the second lever portion 20 and the associated coupling pin 18 to move upwardly so that the coupling pin 18 is positioned in the path of the abutment 16 as shown in Fig. 1. In this effective position of the coupling lever 17, when the interior lever 9 is lifted to rotate the lever 26, the coupling pin 18 on the second lever portion 20 contacts the abutment 16, thus pressing down on the pin 14 and causing the keeper pawl 8 to rotate or swing in the clockwise sense.

The Official Action sets forth two different rejections, each involving interpreting certain of the features shown in *Jahrsetz et al.* as corresponding to the features recited in the independent claims. One rejection involves interpreting the release lever 15 as corresponding to the claimed open link and interpreting the member 28 as corresponding to the claimed inside lever. The other rejection involves interpreting the coupling lever 17 as

corresponding to the claimed open link and interpreting the lever 9 as corresponding to the claimed inside lever.

To more clearly highlight ways in which the claimed vehicle door lock system differs from these interpretations, Claim 1 has been amended to recite that the previously defined inside lever is rotatably mounted and to also recite that the previously defined engagement between the inside lever and the open link moves the open link in a non-rotating manner. For similar reasons, independent Claim 18 has been amended to recite that the previously defined inside lever is rotatably mounted and to recite that the previously defined engagement of the inside lever with the open link resulting from operation of the door handle moves the open link in a non-rotating manner. Also, independent Claim 21 has been amended to recite that the previously defined inside lever is rotatably mounted and to recite that the previously defined engagement of the part of the inside lever with the engaging portion of the open link when the open link is in the unlocked position and resulting from operation of the door handle causes the open link to move in a non-rotating manner into contact with the unitarily rotatable element of the pawl. The description in, for example, paragraph [0026] of the present application describes the rotatable mounting of the inside lever while the description in, for example, paragraph [0034] of the present application describes the movement of the open link, with such movement being non-rotating movement. This provides an arrangement which contributes to making it easier to establish engagement between the inside lever and the open link.

Considering both of the interpretations set forth in the Official Action, the door lock described in *Jahrsetz et al.* does not include, together with the other features recited in Claim 1, both a rotatably mounted inside lever and an open link that is moved in a non-rotating manner when the inside lever rotates into engagement with the open link. Similarly, the door lock described in *Jahrsetz et al.* does not include, in combination with the other features recited in Claim 18, both a rotatably mounted inside lever adapted to be operated through operation of a door handle so that the inside lever rotates into engagement with the open link upon operation of the door handle and an open link that moves in a non-rotating manner upon engagement by the inside lever. Further, the door lock described in *Jahrsetz et al.* does not include, together with the other features recited in Claim 21, both a rotatably mounted inside lever that rotates in response to operation of the door handle and an open link that moves in a non-rotating manner into contact with the unitarily rotatable element of the pawl upon engagement of a part of the inside lever with an engaging portion of the open link.

*Konchan et al.* is said to disclose an inside lever that is biased to a rest position. However, this document does make up for the deficiencies pointed out above with respect to the disclosure contained in *Jahrsetz et al.* Accordingly, combining the disclosures contained in *Konchan et al.* and *Jahrsetz et al.* would not have resulted in a door lock system having the claimed combination and arrangement of features recited in the independent claims. Withdrawal of the stated rejections is thus respectfully requested.

New dependent Claims 25-31 define additional distinguishing characteristics associated with the claimed door lock system. For example, Claims 25-27 recite that the swing lever is provided with one of a pin and a groove while the open link is provided with the other of the pin and the groove, wherein the pin is positioned in the groove. Claims 28 and 29 recite that the swing lever is provided with one of a pin and a concave portion, while the rotary gear member is provided with the other of the pin and the concave portion, wherein the pin engages the concave portion so that rotation of the rotary gear member results in rotation of the swing lever. Finally, Claims 30 and 31 define that the rotary gear member is an element that is separate from the swing lever. All of the features further distinguish the claimed invention over the disclosures contained in the documents relied upon in the Official Action.

Should any questions arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at the number indicated below.

Respectfully submitted,

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